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10 *Dennett Ingram and EpicUp Holdings, Inc.*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 THEODORE LEACH; and JAMES
14 KERRIGAN,

15 Plaintiffs,

16 v.

17 DENNETT INGRAM; EPICUP HOLDINGS,
18 INC. (ARIZONA); EPICUP PTE, LTD.; and
19 EPICUP HOLDINGS, INC. (WYOMING),

20 Defendants.

Case No. 2:22-cv-01809-JAD-NJK

**STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND TIME FOR DEFENDANTS
DENNETT INGRAM, EPICUP HOLDINGS,
INC. (ARIZONA); EPICUP PTE, LTD.; and
EPICUP HOLDINGS, INC. (WYOMING);
AND EPICU., TO PLEAD,
COUNTERCLAIM, OR OTHERWISE
RESPOND TO PLAINTIFFS' FIRST
AMENDED COMPLAINT**

[FIRST REQUEST]

Complaint filed: October 28, 2022

Assigned to Hon. Judge Jennifer A. Dorsey

21 Defendants Dennett Ingram, EpicUp Holdings, Inc., an Arizona Corporation, EpicUp PTE,
22 Ltd. and EpicUp Holdings, Inc., a Wyoming Corporation. ("Defendants") by and through counsel
23 of record, and Plaintiffs Theodore Leach and James Kerrigan ("Plaintiffs"), have agreed and
24 stipulated to the following:

25 1. On October 6, 2022, Plaintiffs filed a Complaint in Eighth Judicial District Court
26 in Case No. A-22-859512-B. Plaintiffs were served on October 13, 2020.

27 2. On October 14, 2022, Plaintiffs filed a First Amended Complaint, naming two
28 additional entities: EpicUp PTE, Ltd. and EpicUp Holdings, Inc. (Arizona).

3. On October 28, 2022, Defendants Dennett Ingram; and EpicUp Holdings, Inc., filed a Notice of Removal in Case No. A-22-859512-B and a Petition for Removal in the above-captioned matter [Dkt. 1].

4. Defendants Dennett Ingram, EpicUp Holdings, Inc., a Wyoming Corporation's Answer to Plaintiffs' Complaint might otherwise be due November 4, 2022.

5. The Parties have agreed to extend Defendants' response thirty days in order to allow Defendants to consider the facts and circumstances of the pending First Amended Complaint.

6. The parties hereby request this Court to further extend the date for Defendants to respond to Plaintiffs' First Amended Complaint until **December 5, 2022**.

This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

IT IS SO STIPULATED.

DATED: November 4, 2022.

LAW OFFICES OF MILES N. CLARK, LLC

/s/ Miles N. Clark

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*Counsel for Plaintiffs
Theodore Leach and James Kerrigan*

IT IS SO ORDERED.

Dated: November 7, 2022



Nancy J. Koppe
United States Magistrate Judge